

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

59-01

12/21/2001

INSPECTION OF POULTRY FEET (PAWS)

What is the purpose of this notice?

This notice provides guidance to Food Safety and Inspection Service (FSIS) inspectors-in-charge (IICs) on the circumstances in which to apply the United States Department of Agriculture (USDA) mark of inspection to poultry feet.

What is the current inspection procedure for poultry feet?

Most establishments separate the feet from the carcass early in the slaughter process, after defeathering and before evisceration begin, and do not present the feet for FSIS post mortem (PM) inspection. Feet produced in this way do not qualify to receive the USDA mark of inspection. However, FSIS provides sanitation supervision for these uninspected feet during their harvesting, chilling, and packaging processes.

Are poultry feet edible?

Poultry feet are considered edible and a premium product as human food in many parts of the world, including in some communities in the United States. Many FSIS poultry inspected establishments export uninspected feet to foreign countries.

Can poultry feet receive the USDA mark of inspection?

Yes, poultry feet may receive the USDA mark of inspection. To qualify, they must receive PM examination by FSIS IICs. Upon PM inspection, feet that are found not to be adulterated shall be passed for human food as described in 9 CFR 381.79.

What are the PM condemnation disposition criteria applicable to poultry feet inspection?

There are two types of conditions that can lead to condemnation of feet:

DISTRIBUTION: Inspection Offices;
T/A Inspectors; Plant Mgt; T/A Plant
Mgt; ABB;PRD; Import Offices

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OPI: OPPDE/IESDS

- A. Systemic, e.g. septicemia/toxemia, leukosis complex, or localized conditions with evidence of general systemic involvement would require condemnation of the entire carcass, including the feet.
- B. Localized conditions affecting one or both feet can require condemnation of the affected part. Localized wounds and ulceration are the common causes of feet condemnation.

What are the PM inspection procedures for poultry feet to take place?

FSIS inspection personnel determine the final disposition of poultry, including feet. Removal of localized conditions, including abnormalities confined to the feet, under regulatory poultry slaughter systems (SIS, NELIS, and NTI), except the Traditional Inspection System, is an establishment responsibility subject to FSIS verification to ensure the removal of these conditions (defects).

Establishments may process detached poultry feet in “batches” that correspond with batches of carcasses. Under this processing scenario, when a single carcass from a specific batch is condemned at the PM inspection station, the entire correlative batch of feet collected in a separate location also will be condemned. This association is an acceptable identification of the feet with the rest of the carcass, provided:

- A. Establishments develop written procedures for their “batch” process. The procedure must be acceptable to the IIC.
- B. There is low carcass systemic pathology identified at the FSIS PM inspection station. Establishments may perform identification and condemnation of carcasses affected with systemic conditions prior to the carcass/feet separation to minimize the FSIS whole carcass condemnations. Such approach must be included in the “batch” procedure description. Carcasses condemned by the establishment personnel are reported as plant rejects.
- C. Whenever FSIS inspection personnel condemn a carcass at any PM inspection station, the Inspector Helper immediately communicates the condemnation to management. In response, management condemns the batch of poultry feet associated with the condemned carcass.
- D. The IIC will verify the batch process to ensure that the written procedures are being followed effectively.

Other innovative approaches to accomplish feet inspection would be considered experimental. Therefore, FSIS inspection personnel should refer interested establishments to the Inspection and Enforcement Standards Development Staff (IESDS) at the following address:

USDA, FSIS, OPPDE
Director IESDS
1400 Independence Ave.
Room 202, Cotton Annex Building
Washington, DC 20250

Are there any other inspection activities concerning edible poultry feet?

The IIC will ensure that establishments:

- A) Are maintaining good sanitary conditions at all times during feet processing, chilling, and packaging;
- B) Have considered whether there are any food safety hazards that are reasonably likely to occur in their edible feet production process as part of their hazard analysis (see 9 CFR 417.2).
- C) Have removed any defects from the edible poultry feet to ensure that the product being produced is wholesome and unadulterated. The IIC will verify at a location after the feet chill step that any defects have been removed from the feet. These defects include:
 - 1. Processing defects e.g., toe nails, cuticles, and extraneous materials; and
 - 2. Trimmable defects e.g., wounds, ulcers, and compound fractures.

Where should FSIS inspection personnel go for further guidance?

For technical guidance contact the Technical Service Center (TSC). For guidance related to regulatory activities refer questions through supervisory channels.

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